

Daniel T. Huang, ESQ. (Cal Bar 185948)
Law Office of Daniel Huang
506 N. Garfield Ave., Ste. 100
Alhambra, CA 91801
Tel: (626) 289-0006
Fax: (866) 295-7308
daniel@danielimmigration.com

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JIAN MING ZHONG, individually,
CHEN ZHONG, individually,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
STATE; CONDOLEEZZA RICE, in her
Official Capacity, Secretary of State of the
United States; MAURA HARTY, in her
Official Capacity, Assistant Secretary for
Consular Affairs, Department of State;
ROBERT GOLDBERG, in his Official
Capacity, Consul General, U.S. Consulate
in Guangzhou; MICHAEL JACOBSEN, in
his Official Capacity, Consular Section
Chief, U.S. Consulate in Guangzhou;
EMILIO T. GONZALEZ, Director of the
United States Immigration and
Naturalization Service,

DEFENDANTS.

Case No.:

CERTIFICATE AS TO INTERESTED
PARTIES

The undersigned, counsel of record for Plaintiffs Jian Ming Zhong and Chen
Zhong, certifies that the following listed parties have a direct, pecuniary interest in the

1 outcome of this case. These representations are made to enable the Court to evaluate
2 possible disqualification or recusal.

3 1. Defendant UNITED STATES DEPARTMENT OF STATE¹ is an agency of
4 the United States government involved in the acts challenged, employs the officers
5 named as defendants in this complaint.
6

7 2. Defendant CONDOLEEZZA RICE is the Secretary of State (hereinafter
8 “Secretary Rice”) of the United States. This action is brought against Secretary Rice in
9 her official capacity, as she is charged with the administration and the enforcement of
10 immigration and nationality laws relating to the powers, duties, and functions of
11 diplomatic and consular officers of the United States.
12

13 3. Defendant MAURA HARTY is the Assistant Secretary for Consular Affairs²
14 of the Department of State. This suit is brought against Assistant Secretary Harty in her
15 official capacity, as she is charged with oversight of all consular, including visa matters.
16

17 4. Defendant ROBERT GOLDBERG is the Consul General³ of the U.S.
18 Consulate in Guangzhou. This suit is brought against Consul General Goldberg in his
19 official capacity, as he is responsible for oversight of all consular activities of the
20 consulate.
21

22 5. Defendant MICHAEL JACOBSEN is the Consular Section Chief⁴ of the
23 U.S. Consulate in Guangzhou, and this action is brought against him in his official
24 capacity. Section Chief Jacobsen is responsible for directing the Immigrant Visa Unit,
25
26

27 ¹ Hereafter “DOS.”

28 ² Hereafter “Assistant Secretary Harty.”

³ Hereafter “Consul General Goldberg.”

⁴ Hereafter “Section Chief Jacobsen.”

1 the unit directly responsible for the processing of immigrant visa applications, including
2 Ms. Zhong's following to join application.

3 7. Defendant EMILIO T. GONZALEZ is the Director of the U.S. Citizenship
4 and Immigration Services⁵, the agency responsible for processing Plaintiffs' I-824
5 application, and providing application instructions to the general public on following to
6 join cases.
7

8 8. Office of the United States Attorney. Office of the United States Attorney
9 represents the USCIS, DHS, and the Attorney General of the United States in all
10 matters before the U.S. Federal District Court
11

12 Dated: June 6 2008
13
14

15 Daniel T. Huang
Attorney at Law

16 Law Office of Daniel Huang
17 506 N. Garfield Ave., Ste. 100
Alhambra, CA 91801
18 Tel: (626) 289-0006
Fax: (866) 295-7308
19 daniel@danielimmigration.com
20
21
22
23
24
25
26
27
28

⁵ Hereafter "USCIS."